

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS NERI (PR/USPS-T-4: 1-3)

(December 21, 2011)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Due to availability of the Public Representative and staff to review Postal Service answers, and the press of other business over the coming holidays, the Public Representative proposes that the witness provide answers no later than January 12, 2012, rather than the customary 14 days. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-4-1

Please refer to page 2 of your testimony where you state, "Through Network Rationalization, the Postal Service can adapt its network and infrastructure to current and projected economic realities. The Postal Service must significantly reduce excess capacity and cut costs across the board. "

- a. Please confirm that you use the term 'Network Rationalization' to describe removing excess capacity from the mail processing network. If not confirmed, please explain and provide a definition for the term.
- b. Please, provide empirical evidence illustrating "excess capacity" for the mail processing network. Please provide and explain all calculations and data.

PR/USPS-T-4-2

Please refer to page 29 of your testimony, specifically Figure 12: Productivity, which shows the percentage productivity improvement you estimate for 26 mail processing operations. You indicate at pages 27-30 that these figures are based on savings from several components. Please provide a library reference (or citation to existing library reference with specific file, worksheet, and cells identified) with all data and calculations that:

- a. shows the derivation of the cost of each operation for the current network, and
- b. shows the derivation of the annual cost of each operation in the realigned network.

PR/USPS-T-4-3

Please refer to page 30 of your testimony where you state that you used a method used to estimate the staffing for support personnel that is based upon a variety of factors. Please provide a library reference (or citation to existing library reference with specific file, worksheet, and cells identified) with all the data and calculations that were used to estimate the staffing support needed in the realigned network.